



## **U.S. Bancorp**

### **Political Contribution Policy**

U.S. Bancorp believes that an important part of responsible corporate citizenship is participation in the political and public policy process. The focus of these efforts is on issues that affect the company, our operations and our stakeholders, such as our employees, customers, shareholders and local communities. As a large financial institution, our business is subject to extensive laws and regulations at the federal, state and local levels, and changes to these laws can significantly affect how we operate, our revenues and the costs we incur. It is important for U.S. Bancorp to engage in the political process in order to advance our long-term interests. Meaningful involvement in the public policy arena includes participating in the electoral process by making informed political contributions and engaging in lobbying activities.

Our Government Relations Department, which is part of our Legal Department, works closely with all of our lines of business to manage our legislative and political activities in a manner consistent with good corporate governance practices and in compliance with all legal requirements.

#### **Corporate Political Contributions**

One important way in which our company makes sure that its interests are represented is to make contributions with corporate funds. U.S. Bancorp is prohibited by law from making contributions or expenditures in connection with any federal and many state elections. Where legally permitted, U.S. Bancorp makes corporate contributions in connection with state and local ballot initiatives and referenda on important policy issues that are likely to impact our business and our stakeholders.

However, U.S. Bancorp's policy is not to make contributions to candidates for political office, political parties or committees, or political committees organized for the advancement of political candidates. Furthermore, U.S. Bancorp does not make contributions to other political actions organized under Section 527 of the Internal Revenue Code or to special interest lobbying groups organized under Section 501(c)(4) of the Internal Revenue Code, even when legally permissible.

U.S. Bancorp supports ballot initiatives that are consistent with our contribution priorities, which include initiatives that would make a positive impact our ability to do business, spur economic growth and enhance the quality of life in our communities. Corporate political contributions and expenditures are made based on requests from employees. Those requests are approved by the Director of Government Relations with support from local market presidents. Government Relations reviews each request to

ensure that the contribution is consistent with our contribution priorities. Although U.S. Bancorp does not have a standard maximum amount for any single corporate contribution, we do comply with all applicable state and local laws pertaining to contribution limits. Moreover, all corporate contributions are disclosed to state and local campaign finance agencies when legally required.

### **Legislative Lobbying**

As part of our involvement in the political process, U.S. Bancorp regularly expresses its views and concerns on public policy to public officials. We monitor current legislation, analyze trends, and support and promote the advancement of public policies to benefit our company and its stakeholders.

U.S. Bancorp's Government Relations staff actively lobbies public officials on issues that impact our company and our ability to do business. U.S. Bancorp also retains lobbyists to advocate on our behalf as needed. U.S. Bancorp complies with all lobbying and disclosure laws, including the federal Lobbying Disclosure Act, and submits semi-annual reports to the United States Senate and House of Representatives. Copies of these filings can be found at [lobbyingdisclosure.house.gov/index.html](http://lobbyingdisclosure.house.gov/index.html) and [senate.gov/legislative/Public\\_Disclosure/LDA\\_reports.htm](http://senate.gov/legislative/Public_Disclosure/LDA_reports.htm). In addition, a portion of the dues that we pay to certain industry trade associations are used for lobbying efforts to have a voice in legislative matters that have similar effects on many industry participants.

### **The U.S. Bancorp Political Participation Program - U.S. Bancorp's Federal Political Action Committee (PAC)**

The U.S. Bancorp PAC is a non-partisan committee that provides an opportunity for company employees to participate in the political process. The PAC collects voluntary contributions from eligible U.S. Bancorp employees, and uses those funds to support candidates running for elective office, political parties, and other political action committees that are supportive of U.S. Bancorp's public policy goals. The PAC does not make any contributions in support or opposition to initiatives or referenda. PAC contributions are reported to the Federal Election Commission as well as any state and local campaign finance agencies as required by applicable law.

The PAC is administered by the PAC Board of Directors, which adheres to established governance and compliance procedures that ensure management oversight, consistent funding decisions and compliance with all campaign finance regulations, including the Federal Election Campaign Act and Municipal Securities Rulemaking Board Rule G-37. The PAC Board of Directors, consisting of U.S. Bancorp senior leaders from across our retail footprint, reviews and approves PAC contributions quarterly, and considers a candidate's voting record, leadership positions, committee assignments, general support of the financial services industry and other factors in making

contribution decisions. Contributions are made based on requests by employee contributors to the PAC and at the recommendation of Government Relations. The Board also approves any changes made to the PAC bylaws, which establish the PAC's operating rules and criteria for making contributions.

### **Reporting Practices**

In addition to the public reporting of various corporate political contributions and PAC contributions that is required under laws and regulations, all of U.S. Bancorp's political contributions and expenditures will be disclosed in a semi-annual report that is posted on our corporate website at [www.usbank.com](http://www.usbank.com) under "About U.S. Bancorp," in the Corporate Governance section.



# **U.S. Bancorp Political Contributions Report**

## **January – June 2011**

U.S. Bancorp complies fully with all federal, state, and local laws and reporting requirements governing PAC contributions as well as political contributions made with corporate funds.

U.S. Bancorp's Political Contributions Policy requires that all contributions from U.S. Bancorp's PACs and the corporation be compiled and published semi-annually in a report that is made publicly available on its corporate website. This report and the Political Contributions Policy are reviewed by the Community Reinvestment and Public Policy Committee of the U.S. Bancorp Board of Directors.

The U.S. Bancorp Political Participation Program Board of Directors is comprised of no more than 11 senior leaders from across U.S. Bancorp's retail footprint, which reviews and approves all PAC contributions on a quarterly basis. The members of the PAC Board of Directors currently are:

**Ed Dwyer**  
Senior Vice President –  
Community Banking

**Darrell Brown**  
Senior Vice President – Greater  
Los Angeles Coastal Region

**Mike Nickels**  
Region President – Eastern  
Wisconsin

**Steve Caves**  
Division Manager – Iowa

**Wayne Hirsch**  
Region President – Montana &  
Northern Wyoming

**Christine Hobrough**  
Metropolitan Region Manager  
– Twin Cities

**Ross Carey**  
Executive Vice President –  
Metropolitan Banking

**Bill Fanter**  
Metropolitan Region Manager –  
Chicago

**Michael Shelley**  
Region President – Arkansas

The U.S. Bancorp Federal Political Action Committee Board of Directors is comprised of no more than 11 senior leaders from across U.S. Bancorp's retail footprint, which reviews and approves all PAC contributions on a quarterly basis. The members of the Federal PAC Board of Directors currently are:

**Michael Walker**  
Market President – Northern  
California

**Malia Wasson**  
Market President – Oregon and  
Southwest Washington

**Scott Lockard**  
Market President – Madison,  
Wisconsin

**Lynn Rosinsky**  
Market President – Chicago

**Mark Wheeler**  
Regional Chairman – Ohio,  
Kentucky, Tennessee

The following expenditures were made by U.S. Bancorp and its PACs during the semi-annual period ending on June 30, 2011.

CANDIDATE/COMMITTEE NAME	OFFICE/COMMITTEE TYPE	PARTY	DISTRICT	PPP PAC	FEDERAL PAC	CORP.
<b>ALABAMA</b> Growth & Prosperity PAC	Leadership PAC	Republican		\$5,000		
<b>ARIZONA</b> Arizona Bankers Association PAC	Trade Association PAC	Non-Partisan		\$1,000		
<b>CALIFORNIA</b> California Bankers Association PAC	Trade Association PAC	Non-Partisan		\$5,000		
<b>COLORADO</b> Ed Perlmutter Colorado Bankers Association PAC	U.S. House of Representatives Trade Association PAC	Democratic Non-Partisan		\$2,000 \$1,500		
<b>DELAWARE</b> Tom Carper	U.S. Senate	Democratic		\$3,500		
<b>FLORIDA</b> Bill Nelson	U.S. Senate	Democratic		\$2,500		
<b>GEORGIA</b> Republican Majority Fund	Leadership PAC	Republican		\$5,000		
<b>IDAHO</b> Idaho Bankers Association PAC	Trade Association PAC	Non-Partisan		\$1,000		
<b>ILLINOIS</b> Larry Bomke Raymond Poe Illinois Bankers Association PAC	State Senate State Representative Trade Association PAC	Republican Republican Non-Partisan	50 99	\$1,000 \$750 \$1,000		
<b>INDIANA</b> Joe Donnelly	U.S. House of Representatives	Democratic	2	\$1,000		
<b>IOWA</b> BUILD PAC (Iowa Bankers Association)	Trade Association PAC	Non-Partisan		\$1,000		
<b>KANSAS</b> Lynn Jenkins Kansas Bankers Association PAC	U.S. House of Representatives Trade Association PAC	Republican Non-Partisan		\$1,500 \$1,000		
<b>KENTUCKY</b> Mitch McConnell Bluegrass Committee Kentucky Bankers Association PAC	U.S. Senate Leadership PAC Trade Association PAC	Republican Republican Non-Partisan		\$1,000 \$2,500 \$1,000		
<b>MICHIGAN</b> Dave Camp	U.S. House of Representatives	Republican	4	\$5,000		



CANDIDATE/COMMITTEE NAME	OFFICE/COMMITTEE TYPE	PARTY	DISTRICT	PPP PAC	FEDERAL PAC	CORP.
<b>MINNESOTA</b>						
Amy Klobuchar	U.S. Senate	Democratic		\$1,000		
Betty McCollum	U.S. House of Representatives	Democratic	4	\$1,000		
<b>MISSOURI</b>						
Claire McCaskill	U.S. Senate	Democratic		\$1,000		
Blaine Luetkemeyer	U.S. House of Representatives	Republican	9	\$1,000		
Deb Hermann	Mayor – Kansas City	Democratic		\$500		
<b>MONTANA</b>						
Jon Tester	U.S. Senate	Democratic		\$1,500		
Montana Bankers Association	Trade Association PAC	Non-Partisan		\$1,000		
<b>NEBRASKA</b>						
Mike Johanns	U.S. Senate	Republican		\$1,000		
Lee Terry	U.S. House of Representatives	Republican	2	\$1,000		
Adrian Smith	U.S. House of Representatives	Republican	3	\$1,000		
Nebraska Bankers Association PAC	Trade Association PAC	Non-Partisan		\$1,000		
<b>NEVADA</b>						
Dean Heller	U.S. Senate	Republican		\$4,000		
Joe Heck	U.S. House of Representatives	Republican	3	\$1,000		
Nevada Bankers Association PAC	Trade Association PAC	Non-Partisan		\$1,000		
<b>NEW MEXICO</b>						
N. Mexico Bankers Association PAC	Trade Association PAC	Non-Partisan		\$1,000		
<b>NEW YORK</b>						
Nan Hayworth	U.S. House of Representatives	Republican	19	\$2,000		
<b>NORTH CAROLINA</b>						
Patrick McHenry	U.S. House of Representatives	Republican	10	\$1,000		
<b>NORTH DAKOTA</b>						
Jack Dalrymple	Governor	Republican		\$500		
<b>OHIO</b>						
John Boehner	U.S. House of Representatives	Republican	8	\$3,500		
Pat Tiberi	U.S. House of Representatives	Republican	12	\$3,500		
Steve Stivers	U.S. House of Representatives	Republican	15	\$2,000		
Bill Coley	State Senate	Republican	4	\$500		
Michael Coleman	Mayor – Columbus	Democratic		\$500		
Ohio Bankers League PAC	Trade Association PAC	Non-Partisan		\$1,500		
<b>OREGON</b>						
Greg Walden	U.S. House of Representatives	Republican	2	\$2,000		
Oregon Bankers Association PAC	Trade Association PAC	Non-Partisan		\$1,500		
Portlanders for Schools	Ballot Issue Committee	Non-Partisan				\$5,000
Yes for Parkrose	Ballot Issue Committee	Non-Partisan				\$500
<b>PENNSYLVANIA</b>						
Pat Tommey	U.S. Senate	Republican		\$1,000		
<b>SOUTH CAROLINA</b>						
Bridge PAC	Leadership PAC	Democratic		\$5,000		

CANDIDATE/COMMITTEE NAME	OFFICE/COMMITTEE TYPE	PARTY	DISTRICT	PPP PAC	FEDERAL PAC	CORP.
<b>TENNESSEE</b>						
Bob Corker	U.S. Senate	Republican		\$5,000		
Tennessee Bankers Association PAC	Trade Association PAC	Non-Partisan		\$1,000		
<b>TEXAS</b>						
Jeb Hensarling	U.S. House of Representatives	Republican	5	\$2,000		
Pete Sessions	U.S. House of Representatives	Republican	32	\$1,500		
<b>UTAH</b>						
Orrin Hatch	U.S. Senate	Republican		\$1,000		
Utah Bankers Association PAC	Trade Association PAC	Non-Partisan		\$1,000		
<b>VIRGINIA</b>						
Robert Hurt	U.S. House of Representatives	Republican	5	\$2,000		
Eric PAC	Leadership PAC	Republican		\$2,500		
<b>WASHINGTON</b>						
Washington Bankers Association PAC	Trade Association PAC	Non-Partisan		\$1,500		
<b>WEST VIRGINIA</b>						
Joe Manchin	U.S. Senate	Democratic		\$1,000		
Shelley Moore Capito	U.S. House of Representatives	Republican	2	\$1,000		
<b>WISCONSIN</b>						
Sean Duffy	U.S. House of Representatives	Republican	7	\$2,000		
Gwen PAC	U.S. House of Representatives	Democratic		\$1,500		
Wisconsin Bankers Association PAC	Trade Association PAC	Non-Partisan		\$1,500		
<b>NATIONAL</b>						
American Bankers Association PAC	Trade Association PAC	Non-Partisan		\$5,000		
Consumer Bankers Association PAC	Trade Association PAC	Non-Partisan		\$5,000		
Financial Services Roundtable PAC	Trade Association PAC	Non-Partisan		\$5,000		
International Association of Shopping Centers PAC	Trade Association PAC	Non-Partisan		\$5,000		
Mortgage Bankers Association PAC	Trade Association PAC	Non-Partisan		\$5,000		
National Association of Government Guaranteed Lenders PAC	Trade Association PAC	Non-Partisan		\$5,000		
House Conservative Fund	Leadership PAC	Republican		\$2,500		



## Industry Initiatives and Lobbying

U.S. Bancorp retains lobbyists to advocate on our behalf on issues important to our company and industry. From January through June 2011, U.S. Bancorp's expenditures for these activities were \$736,752.00. U.S. Bancorp is also a member of numerous industry trade associations at the national, state and local levels. U.S. Bancorp's public policy positions are often communicated through these organizations, which enables us to reach government officials more efficiently and in concert with peers in the financial services industry.

U.S. Bancorp requests from the trade associations to which it pays more than \$50,000 in annual dues, a report of the portion of U.S. Bancorp dues that are used for expenditures or contributions that, if made directly by U.S. Bancorp, would not be deductible under Section 162(e)(1)(B) of the Internal Revenue Code. We are disclosing in this report the information received from those trade associations with respect to the most recent semi-annual reporting period.

TRADE ASSOCIATION	LOBBYING/POLITICAL EXPENDITURES
American Bankers Association Card Policy Council	\$60,000.00
Financial Services Roundtable	\$109,600.00
Investment Company Institute	\$22,254.00
Securities Industry and Financial Markets Association	\$9,010.00
Iowa Bankers Association	\$21,702.00
Idaho Bankers Association	\$18,200.00
Nebraska Bankers Association	\$7,950.00
Oregon Bankers Association	\$27,600.00
Portland Business Alliance (Oregon)	\$2,160.00
St. Louis Regional Chamber and Growth Association	\$11,000.00
Wisconsin Bankers Association	\$28,140.00

